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November 21, 2024

**Via ECF**

Hon. Peggy Kuo, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Defendants' Motion for Leave to file Sealed Responses and Opposition to  
Plaintiff's Motion to Compel and Sanction for Figueroa v. Mayflower Int. Hotel  
Group, et al. Case No. 23-cv-4729**

Dear Hon. Kuo:

I am the attorney on behalf of Defendants in the above referenced action. I am submitting this letter as an application for leave to file Defendants' responses and opposition with supporting documents in response to Plaintiff's motion to compel and sanction under seal.

Defendants move for leave to file defendant's responses and opposition under seal because the criminal proceedings information included in the responses and supporting documents provided by defendant's criminal defense counsel in attached exhibit, which shall be sealed from public review required by the law.

Defendants respectfully request this court to review the attached responses and supporting documents and grant the motion for leave for sealed filing or any other or further relief this court deems just and proper.

Respectfully submitted,  
KEVIN KERVENG TUNG, P.C.  
Attorney for Defendants

/s/ Bo Chen

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By: Bo Chen, Esq. [BC-3831]